UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

MICHAEL T. FLYNN,

Crim. No. 17-232 (EGS)

Defendant

UNOPPOSED MOTION FOR PROTECTIVE ORDER GOVERNING DISCOVERY

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by and through Special Counsel Robert S. Mueller, III, hereby respectfully moves the Court for entry of a protective order governing the production of discovery by the parties in the above-captioned case. The United States has conferred with counsel for the defendant, and the defendant consents to this motion and entry of the attached protective order. The attached protective order incorporates the Court's changes issued by Minute Order on February 14, 2018, to which neither the United States nor the defendant objects.

Respectfully submitted,

ROBERT S. MUELLER III Special Counsel

Dated: February 20, 2018 By:

Brandon L. Van Grack Zainab N. Ahmad (202) 616-0800

/s/